

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Steve A. Altland	:	
Jennifer R. Altland	:	Chapter 13
Debtors	:	
	:	Case No. 1:22-00209
U.S. Bank National Association, as Trustee	:	
For American General Mortgage Loan Trust	:	
2009-1, American General Mortgage Pass-Through	:	
Certificates, Series 2009-1	:	
	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Steven A. Altland	:	
Jennifer R. Altland	:	
	:	
Respondents	:	
and	:	
Jack Zaharopoulos	:	
	:	
Trustee	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 12th day of July, 2023, comes the respondents, Steven A. Altland and Jennifer R. Altland, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The exhibits speak for themselves.
5. Admitted.
6. Denied. It is admitted that the Debtors have failed to make certain post-

petition mortgage payments because of some financial difficulties due to unexpected

vehicle repairs. The Debtors paid two mortgage payments to their mortgage company one day before the Motion for Relief was filed.

7. Denied. Due to the Debtors recent payment, there is no post-petition reinstatement amount due.

8. Denied. Debtors are without knowledge as to the principal balance due on the loan.

9. Denied. The movant is not entitled to relief from the automatic stay pursuant to 11 U.S.C. § 362(d).

10. Denied. Debtor are without knowledge as to whether, and to the extent which, Movant has incurred legal expenses.

11. Denied. The averments of Paragraph 11 constitute conclusions of law to which no response of pleading is required.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,

CGA Law Firm, P.C.

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
Counsel for Debtor
135 North George Street
York, PA 17401
(717) 848-4900

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and	:	
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	:	
Trustee	:	

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2023, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack Zaharopoulos
Chapter 13 Trustee
ECF

Denise Carlon, Esquire
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire